

Serial No. 10/631,070  
Attorney Docket No. AUS920030524

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## II. REMARKS

### A. Summary of the Response

Claims 1 to 50 were rejected in the Final Office Action of May 15, 2007.

Claims 1, 7, 8, 14, 15, 20, 21, 25, 26, 32, 33, 39, 40, 45, 46, and 50 are amended

Claims 1 to 50 remain pending

### B. Detailed Response

Applicants note with appreciation the Examiner's withdrawal of the prior rejections under 35 USC §§ 101 and 112.

#### 1. Double Patenting – Copending SN 10/617,530

Claims 1-50 are provisionally rejected on the ground of nonstatutory obviousness-type double patenting as being unpatentable over claims 1-30 of copending Application No. 10/617,530 in view of

<http://web.archive.org/web/20001204034200/http://www.mandarintools.com/>, Chinese-English Dictionary link (hereafter "Mandarintools").

**Response:** As shown by the declarations and assignments on file in this and the co-pending application 10/617,530, as well as by the signature of Applicant's attorney below, both the present application and the co-pending application 10/617,530 are made by the same inventive entity (Chen and Dunsemoir). The present application and the co-pending application 10/617,530 are also both owned by a common assignor (International Business Machines Corporation). The claims of application 10/617,530 have not issued. Applicants are filing a Terminal Disclaimer, but reserve the right to withdraw the same if appropriate.

#### 2. Double Patenting – Copending SN 10/617,526

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Claims 1-50 are also provisionally rejected on the ground of nonstatutory obviousness-type double patenting as being unpatentable over claims 1-58 of copending Application No. 10/617,526 in view of the referenced Mandarintools.

**Response:** As shown by the declarations and assignments on file in this and the co-pending application 10/617,526, as well as by the signature of Applicant's attorney below, both the present application and the co-pending application 10/617,526 are made by the same inventive entity (Chen and Dunsmoir). The present application and the co-pending application 10/617,526 are also both owned by a common assignor (International Business Machines Corporation). The claims of application 10/617,526 have not issued. Applicants are filing a Terminal Disclaimer, but reserve the right to withdraw the same if appropriate.

**3. Claim Objections:**

The Examiner objected to claims 7 and 14 because the displaying limitation disclosed in these claims is already taught in the independent claims on which claim 7 and 14 depend.

**Response:** Applicant amended claims 7 and 14 to delete the redundant element already present in the independent claims 1 and 8.

**4. Amendment to Correct Informality:**

Claims 1, 8, 15, 21, 33, 40, and 46 have been amended to provide a clear antecedent basis for "the graphical user interface" recited in all of these claims. This amendment was made for clarity and not in response to an objection by the Examiner.

**5. 35 USC §103(a) Rejections:**

**a) Claims 15-19 and 40-44.**

The examiner rejected claims 15-19, and 40-44 under 35 USC 103(a) as being unpatentable over Chinese-English Dictionary

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(<http://web.archive.org/web/20001204034200/http://www.mandarintools.com/>) (hereinafter,

"Mandarintools") in view of Chinese-English Lookup

(<http://web.archive.org/web/20010309104519/http://home.iprimus.com.au/richwarm/cel/cel.htm>)

(hereinafter, "Lookup").

**Response:** Mandarintools and Lookup, alone or in combination, do not teach or suggest all of the elements of any of Applicants' claims. It is well established that the Examiner has the burden of proof to establish a *prima facie* case of obviousness under 35 U.S.C. §103(a). MPEP 2142 states:

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, **the prior art reference (or references when combined) must teach or suggest all the claim limitations.** The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. [Emphasis added]

Independent claims 15 and 40 have each been amended to contain the following elements:

searching a dictionary for an entry containing the Pin Yin word;  
using Unicode to translate the Pin Yin word into a Traditional Chinese word, a Simplified Chinese word, and an English word; and  
responsive to a user activation of a single control on the graphical user interface, **simultaneously displaying the Pin Yin word, the Simplified Chinese word, the Traditional Chinese word, and the English word.**

Mandarintools contains a reference to a Chinese/English look up dictionary, but the example given of this dictionary does not teach or suggest Applicants' use of Unicode to translate PinYin into Traditional Chinese, Simplified Chinese and English and to **simultaneously display all four forms of the word in response to a single control action on a graphical user interface.**

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The search template example given in Mandarintools will translate any of the four forms of a word to only Traditional Chinese or Simplified Chinese. Multiple translations are possible, but only in response to multiple search queries. (See search template at the top of the page of Mandarintools). The limited functionality is confirmed by the alternate TigerNT and G.Q. Shen "mirror sites" disclosed on page 1 of Mandarintools. These "mirror sites" make it clear that only one form of the Chinese word will be displayed at a time in response to a search request. Multiple search queries are required to separately display all four forms of the word. Applicants do not believe that an amendment was required to highlight this distinction over the art. Even so, Applicants amended all of the independent claims to further clarify that Applicants teach the simultaneously display of all four forms of the Chinese word in response to a single control action.

"Lookup" does not cure the deficiency of Mandarintools. Lookup is a Chinese English lookup utility that reads a Chinese character from the Windows clipboard and automatically displays the corresponding entries from a public domain Chinese/English dictionary. It does not have a graphical user interface, and it does not translate English words into Chinese. According to the Lookup documentation (CEL2DOC.TXT), multiple copies of the programs must be installed in parallel directories to decode different versions of Chinese (Big5 and GB are mentioned). Lookup does not use Unicode to decode multiple forms of a Chinese word.

The cited prior art, alone or in combination cannot display four forms of a Chinese word simultaneously in response to a single control input. Applicants eliminate many of the steps that would be normally be required to obtain the same information, and they organize all of those results into a single display.

**b) Claims 1-6, 8-13, 21-24, 26-31, 33-38, and 46-49**

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The examiner rejected claims 1-6, 8-13, 21-24, 26-31, 33-38, and 46-49 under 35 USC 103(a) as being unpatentable over Mandarintools in view of Lookup and in further view of Foolsworkshop  
(<http://web.archive.org/web/20021206035901/http://www.foolsworkshop.com/ptou/>)  
(hereinafter, "Foolsworkshop").

*Response:* These claims, including the independent claims 1, 8, 21, 26, 33, and 46 are allowable over the cited references for the same reasons given above in connection with independent claims 15 and 40. The additional reference, "Foolsworkshop," does not cure the deficiencies of Mandarintools and Lookup. According to Foolsworkshop:

This page performs a simple function. It converts text written in **pinyin**, with syllable-final tone numbers, into **unicode**. The result is displayed both as plain unicode text and as the HTML code necessary to display the unicode in a web page.

In other words, Foolsworkshop is not a translator. It merely converts the form of the Pinyin word. Independent claims 1, 8, 21, 26, 33, and 46, as well as the independent claims 15 and 40 discussed above, all simultaneously display the four forms of a Chinese word – Traditional Chinese, Simplified Chinese, Pinyin and English – on a graphical user interface in response to a single user command. Foolsworkshop, alone or in combination with Mandarintools and Lookup, does not teach or suggest Applicants' functionality. All of the remaining claims are dependent on one of the independent claims discussed above and contain all of the elements thereof. Accordingly, Applicants respectfully submit that all of the claims 1-50 are in a condition for allowance.

c) **Dependant Claims 20 and 45; and**  
**Dependant Claims 7, 14, 25, 32, 39, and 50**

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The Examiner rejected the dependant claims 20 and 45 under 35 USC 103(a) as being unpatentable over Mandarintools in view of Lookup and in further view of Hill et al. (USPN 6,023,714, hereinafter "Hill"). The examiner also separately rejected the similar dependent claims 7, 14, 25, 32, 39, and 50 for the same reason.

**Response:** All of these claims are dependent on the independent claims discussed above. They contain all of the elements of those independent claims and are allowable for the same reasons. For the purpose of clarity, however, and without admission or waiver, all of these dependent claims have been amended to contain the following element:

wherein a first the font size of the Simplified Chinese word and the font size of the Traditional Chinese word is user configurable to be larger than a second font size of the accented Pin Yin word, and the English word. [Underlined text added by amendment]

Applicants agree that Hill mentions that the font size of a display may be scaled for readability by the sight impaired user (Hill col 9, lines 33-35). In Hill, *all* of the display fonts are scaled. Hill then selects a device specific display template for use in rendering the display. Hill's approach reduces the amount of information available on the display. Applicants' approach does not improve the readability of the non-Chinese characters as Hill would suggest. While Applicants believe that the above amendment is unnecessary for the allowability of these dependent claims, the amendment is made to add clarity. Applicants are able to increase the size of the often complex Chinese words to improve readability without unnecessarily increasing the size of other information in the display.


### III. CONCLUSION

Applicants respectfully submits that claims 1 – 50 are all in a condition for allowance. In the event that the Examiner believes that additional rejections are in order, the Applicants respectfully request that the above amendments be entered in order to reduce the issues on

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appeal. If the Examiner has any questions or concerns regarding the present claims, the undersigned requests the scheduling of a telephone interview to discuss this case in greater depth. The Applicants counsel may be reached at the telephone number given below.

Respectfully submitted,



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